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12 Attorneys for Plaintiffs,  
13 Roane Holman, Narcisco Navarro Hernandez, Miguel A. Alvarez  
14 and all others similarly situated

15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA

17 ROANE HOLMAN, NARCISCO NAVARRO  
18 HERNANDEZ and MIGUEL A. ALVAREZ on  
19 behalf of all others similarly situated,

20 Plaintiff,

21 v.

22 EXPERIAN INFORMATION SOLUTIONS,  
23 INC.

24 Defendant.

Case No. 11- cv-0180-CW

DECLARATION OF ANDREW J. OGILVIE  
IN SUPPORT OF PLAINTIFFS'  
ADMINISTRATIVE MOTION re  
DISCOVERY ISSUES

25 I, Andrew J. Ogilvie, declare as follows:

26 1. I am one of the attorneys for the plaintiffs in this action.

1           2.       Prior to filing this administrative motion I have communicated numerous times  
2 with Experian's counsel trying to resolve the discovery issues in this case. Most recently I asked  
3 whether Experian would agree to the appointment of a discovery master to oversee the discovery  
4 issues, but Experian refused.

5           3.       **Exhibit A** is a copy of Experian's response to Plaintiffs' Third Request for  
6 Documents. I wrote to Experian's counsel at the end of December trying to resolve the  
7 discovery issues presented by Experian's objections, but Experian has not responded. A copy of  
8 my "meet & confer" letter is **Exhibit B**. Experian says it will send a written response tomorrow.

9           4.       **Exhibit C** is a copy of Experian's Responses to Plaintiffs' Second Set of  
10 Interrogatories. We received this a few days ago.

11           5.       **Exhibit D** is a copy of Experian's Responses to Plaintiffs' Fourth Request for  
12 Documents, which was served on us a few days ago.

13           6.       On December 8, 2011, I served Experian with plaintiffs' notice of deposition of  
14 the employees in its Membership Department who approved Finex to receive Experian's reports.  
15 About a week ago I received an email from Experian's lawyer telling me that it would not  
16 produce those witnesses for their depositions. On January 13, 2012, I received Experian's  
17 Objections to those depositions, which is **Exhibit E**.

18           I declare under penalty of perjury that the foregoing is true and correct. Executed this  
19 18th day of January, 2012 at San Francisco, California.

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21                               /s/ Andrew J. Ogilvie  
22                               Andrew J. Ogilvie  
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